

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHN DOE, a minor, by his next friend and parent, )  
LANDIS SEGER; and LANDIS SEGER, on their )  
own behalf and on behalf of all others similarly )  
situated, ) Case No. 1:16-cv-04571  
)  
Plaintiffs, ) Judge Virginia Kendall  
)  
v. )  
)  
HEALTH CARE SERVICE CORPORATION, )  
)  
Defendant. )  
)

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**PLAINTIFFS' MOTION FOR FINAL ORDER AND JUDGMENT APPROVING  
SETTLEMENT AND DISMISSING ACTION WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiffs Landis Seger and John Doe, on behalf of themselves and all persons similarly situated, and on behalf of the provisionally certified settlement class (collectively "Plaintiffs"), by and through their undersigned counsel, respectfully move this Court to enter an Order granting final approval of the Parties' Settlement Agreement (ECF No. 75-01) and all of the terms and conditions contained therein, and dismissing the above-captioned matter with prejudice. Defendant does not oppose the relief requested by this Motion.

Along with any oral argument that may be presented to the Court and evidence submitted in connection therewith at the Fairness Hearing, Plaintiffs hereby submit the following accompanying documents in support of this Motion:

1. Notice of Plaintiffs' Motion for Final Order and Judgment Approving Settlement and Dismissing Action with Prejudice;
2. Memorandum in Support of Plaintiffs' Motion for Final Order and Judgment Approving Settlement and Dismissing Action with Prejudice;
3. Declaration of Kimberly K. Ness Regarding Settlement Administration Activities Completed as of October 4, 2018;
4. Amended Plan of Allocation
5. Proposed Final Order and Judgment Approving Settlement and Dismissing Action with Prejudice.

WHEREFORE, Plaintiffs respectfully request that the Court: (1) grant final certification of the Settlement Class to implement the Settlement; (2) grant final approval of the Parties' Settlement Agreement (ECF No. 75-01) and all of the terms and conditions contained therein and in all exhibits thereto; and (3) enter final judgment dismissing the above-captioned matter with prejudice.

\* \* \* \*

Dated: October 9, 2018

Respectfully submitted,

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